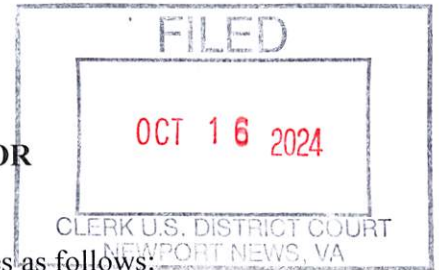


**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
ISSUANCE OF ARREST WARRANT**



Your affiant, Jason Holsinger, being duly sworn and deposed, states as follows:

INTRODUCTION

1. I am a Special Agent (SA) with the United States Department of Justice, Federal Bureau of Investigation (FBI). I am currently a member of an Organized Crime Drug Enforcement Task Force (OCDETF) investigating a criminal organization located in the Hampton Roads area of Virginia in the Eastern District of Virginia (EDVA), California, and elsewhere whose co-conspirators and associates are engaged in the distribution of quantities of illegal narcotics and within the aforementioned localities.

Your affiant makes this affidavit in support of an application for an arrest warrant for the following individual:

a. ANTHONY DREW

CRIMINAL OFFENSES

2. This request for a search warrant is made in relation to the following offenses occurring in the EDVA:

a. Witness Tampering in violation of Title 18 U.S.C. § 1512

EXPERIENCE AND TRAINING OF AFFIANT

3. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code (U.S.C.), Section 2510(7), and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, U.S.C. Section 2516.

4. As a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), I have been assigned to the Norfolk Division, Peninsula Resident Agency, as a full-time member of the Safe

Streets Peninsula Task Force (“SSPTF”) since 2014. I am also a certified Special Agent Bomb Technician (“SABT”) responsible for render-safe operations against explosive and energetic threats and/or devices. Prior to my current assignment, I was assigned to the FBI’s Washington Field Office, Special Surveillance Group, where I worked counterintelligence and counterterrorism investigations for approximately four years. In my current assignment, I am primarily responsible for investigating complex criminal enterprises led by drug trafficking organizations and criminal street gangs, to include drug smuggling conspiracies involving the illegal importation, distribution and possession with intent to distribute illegal narcotics, the distribution and trafficking of illegal firearms, and violent crime in aid of racketeering.

5. Your Affiant has also become familiar with and utilized a wide variety of investigative techniques, including but not limited to the development of cooperating sources, source debriefings, physical surveillance, telephone call detail record analysis, the use of pen register and trap and trace devices, and the interception of wire and electronic communications. These investigations have led to numerous arrests and convictions for violations of federal laws.

EXPERIENCE AND TRAINING OF THE INVESTIGATIVE TEAM

6. This SSPTF investigation is comprised of Special Agents, Task Force Officers, Forensic Accountants (FOA), Asset Forfeiture Investigators (AFI), and Analysts of the FBI as well as representatives from the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), the Newport News Police Department (NNPD), the Hampton Police Division (“HPD”), the Virginia Department of State Police (“VSP”), and a contract analyst from the United States Attorney’s Office (“USAO”). The respective Special Agents, officers, detectives, and analysts assigned to this SSPTF investigation are collectively hereinafter referred to as “the investigative team”.

BASIS FOR FACTS CONTAINED IN AFFIDAVIT

7. Since this affidavit is being submitted only for the limited purpose of securing authorization for an arrest warrant, I have not included each and every fact known to the investigative team concerning this investigation. Rather, I have set forth only those facts that are believed to be necessary to establish probable cause that violations of Title 18 U.S.C. § ^{1512 (j)(4)} ~~1503~~ have occurred.

8. I have personally participated in the investigation of the offenses described in this affidavit. As a result of my participation in this investigation and a review of reports made to me by other members of the investigative team, I am familiar with the circumstances of this investigation. On the basis of this familiarity, and on the basis of the other information which I have reviewed and determined to be reliable, I allege the following:

FACTS AND CIRCUMSTANCES SUPPORTING PROBABLE CAUSE

9. On or about September 17, 2024, a federal Grand Jury of this court returned an indictment of ANTHONY DREW (“DREW”) for violations of federal law including 21 U.S.C. §§ 846 and 841 Conspiracy to Distribute and Possess with Intent to Distribute Marijuana; 18 U.S.C. § 841(a)(1) Possession with Intent to Distribute Marijuana; 21 U.S.C. § 843(b) Use of a Communication Facility in Furtherance of Drug Trafficking; and 18 U.S.C. § 924(c) Possess Firearm in Furtherance of a Drug Trafficking Crime.

10. On or about September 30, 2024, FBI Agents arrested DREW inside the Newport News Circuit Court in Newport News, Virginia.

11. On or about October 10, 2024, this court held a detention hearing for DREW after which DREW was granted a bond. DREW was ordered to not discuss the case with his girlfriend, and witness, TAYLOR WARE (“WARE”).

12. On or about October 10, 2024, during the evening hours, DREW began contacting WARE from the Western Tidewater Regional Jail (“WTRJ”). During several conversations beginning at

approximately 6:08 p.m. and continuing throughout the evening, **DREW** made several statements that were, based upon your Affiant's training, experience, and knowledge of this investigation, consistent with witness tampering and obstruction of justice. Your Affiant has summarized some of those conversations below, in attempt to provide the court with context and portray the escalation of the events.

13. On or about October 10, 2024, at approximately 6:08 p.m., **DREW** contacted WARE from WTRJ via a consensually recorded telephone call. At approximately 2:00 into the call, **DREW** told WARE, "*I love you*" but WARE did not respond. **DREW** then stated "*Bae' ass...Bae ass wrote a goddamn book.*" WARE clarified, "*You say they did?*" to which **DREW** replied, "*I said Bae...Bae did.*" WARE then responded "*No, that's now what happened.*" Later on in the telephone call, **DREW** told WARE "*We movin' in with my Grandma.*" but WARE did not reply. They continued to talk about the detention hearing and how "*they*", referencing the government, "*were dumb as fuck*".

14. The remainder of the conversation remained cordial. **DREW** discussed wanting to go to the Hampton Police Division and get a past obstruction charge removed because he did not "*believe I did that.*" **DREW** began to discuss the detention hearing again by referencing his attorney as "*that nigga*". **DREW** made a reference to the TV show *Power* and how his attorney was "*smooth*". **DREW** asked WARE, "*that nigga did his thing, you don't think so?*" but as WARE started to reply she slipped and said "*...the lawyer*" to which **DREW** quickly interjected with "*Yo!*" After a brief pause, WARE stated "*...this is not about the case!*" and the call abruptly ended.

15. On or about October 10, 2024, at approximately 8:36 p.m., **DREW** contacted WARE from WTRJ via a consensually recorded telephone call. At approximately 4:30 into the call, **DREW** told WARE he was going to get her name tattooed on his ring finger. He repeatedly told her that he loved her but WARE did not reply – she eventually stated, "*no you don't*".

16. On or about October 10, 2024, at approximately 8:45 p.m., **DREW** contacted **WARE** from WTRJ via a consensually recorded telephone call. At approximately 1:26 into the call, **DREW** instructed **WARE** to call his aunt. **WARE** appeared to add an unknown female (“UF#1”) to the call. **DREW** and UF#1 discussed the conspiracy count with which **DREW** is charged. **DREW** stated, “*I was in Indianapolis in 2020...I didn’t come back till 2022.*” UF#1 then stated, “*your lawyer said all they got a charge on is your pistol, basically.*” **DREW** immediately stated, “*It’s alright, it’s alright...*” ending the conversation and telling UF#1 he would call her “*on my own shit*”.

17. On or about October 10, 2024, at approximately 8:48 p.m., **DREW** contacted UF#1 from WTRJ via a consensually recorded telephone call. At approximately 3:05 into the call, UF#1 stated “*I’m so hype...but I’m gonna talk to you when you get out. Shit...cause I ain’t like what they said about her and all that shit.*” **DREW** then exclaimed “*Yo! Word! Like what the fuck!*” UF#1 then stated “*What the fuck! Yeah! Why would she talk...she talk too damn much!*” Your Affiant believes these last statements were in reference to **WARE**’s interview with FBI Special Agent Desirae Maldonado and FBI Special Agent Keysha Bailey on September 30, 2024. Your Affiant testified to some of the statements **WARE** made to agents during the aforementioned detention hearing on October 10, 2024.

18. On or about October 10, 2024, at approximately 8:53 p.m., **DREW** contacted **WARE** from WTRJ via a consensually recorded telephone call. At approximately 1:25 into the call, **DREW** told **WARE** that he “*just got off the phone with my aunt.*” At approximately 2:17 into the call, **WARE** told **DREW** she was “*not in the mood to talk*”. **DREW** appeared to become agitated and told **WARE** “*...stop thinking you know everything, please, everything is not about you, bro...everything not about you, bro...you think everything about you...everything not about you...you’re annoying...like, word, everything gotta be about you and it’s not.*” **WARE** repeatedly replied, “*Ok. Ok. Ok...*” to which **DREW** interjected “*Who the hell you with?*” to which **WARE** replied, “*Iyana*”. **DREW** then stated, “*Let me talk to her.*” When **WARE** asked **DREW**, “*Why?*”, **DREW** replied “*Because, I wanna see if*

you really with her.” WARE was then heard telling an unknown female (“UF#2”) “Say something... he said I’m not with you.” At approximately 3:09 into the call, UF#2 stated to DREW, “you have more to worry about...like please...please...go ahead.” DREW then stated “She said I got more to worry about? Bro, hey bro...she talkin’ ‘bout I got more to worry about! Yo, hey yo, yo...she goin’ goddamn make me unload the clip on her.” When WARE asked, “What’s that mean?” DREW replied, “You will see when I do it.” WARE eventually hung up on DREW.

19. On or about October 10, 2024, at approximately 9:33 p.m., DREW contacted WARE from WTRJ via a consensually recorded telephone call. At approximately 2:31 into the call, DREW told WARE “I love you.” but WARE did not respond. DREW immediately stated, *“Why the fuck...bro, what the fuck, bro, like, bro, come, everything not about you, bro. Like stop making everything about you, bro. That shit goin’ take, its goin’ take shit to another place that it don’t even need to be taken to, bro. Like come on, bro. It’s like stop making everything about you, bro. It’s not about you, bro. Like goddamn. Like, you can’t understand that you can’t understand nothing, bro. Everything is not about you, bro...please know that...like niggas can’t ever do what’s best for them without you feeling some type of way...you make everything about you...like word, motherfuckers wrote a book and got the nerve to be actin’ like this. What the fuck! What about me? Like, what the fuck, I don’t understand it, I don’t understand how a motherfucker can write a book and still act like everything...come on, bro, goddamn...”*

20. As the conversation continued, DREW repeatedly asked WARE to “stop acting selfish” to which WARE replied, *“...I’m not even saying anything, that’s the thing.”* DREW then stated “No, niggas talkin’ ‘bout how you actin’” to which WARE replied, *“You just talked for, you just talked for five whole minutes.”* DREW then exclaimed, *“I talk...bro...you wanna talk about somebody talking too much!”* WARE eventually hung up on DREW. Based upon your Affiant’s knowledge, training, and experience in this investigation, it is believed that DREW’s reference to “you wanna talk about

somebody talking too much” and earlier comments about “*motherfuckers wrote a book*” and “*a motherfucker can write a book*” are all references to the statements WARE made to FBI Agents during her interviews. DREW repeatedly taunted WARE for talking to the FBI.

21. On or about October 10, 2024, at approximately 9:38 p.m., DREW contacted WARE from WTRJ via a consensually recorded telephone call. At approximately 1:15 into the call, DREW started the conversation with “*Why the hell you hangin’ up for? You mad at me? Bro, your ass talkin’ ‘bout you trying to help me! Your ass did everything, your ass trying to corrupt me, nigga! Like Boston Richie said, that shit corrupt me.*” DREW then quickly asked, “*What the hell you doin...what the hell you in the bed?*” to which WARE replied, “*Yeah.*” DREW then asked, “*What you got somebody over there with you?*” to which WARE replied “*Mmm mmm.*” DREW then stated “*Yes, you do...who over there? I know you do dirt...*” As the call continued, DREW was heard talking and laughing with someone in the background but eventually yelled into the phone and stated “*...motherfuckers talkin’ ‘about how they tryin’ to help me now! Motherfucker wanna talk about... God...you ain’t tryin’ to help me! ... Word! Don’t say that! How in the fuck are you tryin’ to help me!*” The call abruptly ended at that point. Your Affiant reviewed the lyrics to the song “Help Me” by Real Boston Richey and prior to the line “*That shit corrupt me*” the lyrics read “*I can’t lie, I ain’t been the same ever since them niggas stuck me*”. Your Affiant believes DREW was making yet another reference to WARE about her talking to the FBI about his criminal activity.

22. On or about October 10, 2024, at approximately 9:46 p.m., DREW contacted WARE from WTRJ via a consensually recorded telephone call. At approximately 1:15 into the call, DREW asked “*Yo, why the hell you ain’t answering the calls?*” to which WARE replied, “*Bro, we don’t need talk...we don’t need to talk.*” DREW then stated, “*I love you*” and followed with “*I just told you, I’m the one saying I love you and you ain’t saying it back...you don’t love me? I know you don’t, couldn’t a did.*” DREW repeatedly asked, “*What the hell goin’ on?*” and then accused WARE of being

“around another nigga.” WARE then stated *“That’s what I’m talking about. Don’t call me back.”* and hung up the phone.

23. On or about October 10, 2024, at approximately 10:37 p.m., DREW contacted WARE from WTRJ via a consensually recorded telephone call. At approximately 1:09 into the call, DREW asked *“What the hell are you doing?”* to which WARE replied, *“What do you want?”* DREW then appeared to become agitated, and stated *“What the hell are you doing? Tell me! Be...man look, just tell me what’chu doin’! Who over there? ...Why the hell you ain’t answering my calls? Nigga, why is you playing with jail calls?”* DREW continued, *“...why the hell is you mad? I didn’t do shit to you! You...you acting like I don’t, I don’t have the right to be mad!”* WARE then stated, *“You don’t.”* DREW then stated, *“Alright, bro. Alright, bro. You just don’t know. You just don’t know, bro. Like that’s just the thing about it. Motherfuckers will come, tell somebody anything, and they believe the shit. And that shit, that’s just a different story. What the hell you doing? What the hell you doing? You wanna play?”* WARE interjected and asked, *“What? What are you saying?”* DREW continued, *“I’m saying, you wanna play with me? ...Do you wanna play with me?”* WARE then stated, *“...I didn’t say nothing about playing with you...”* but DREW talked over her and stated *“...you moving crazy!”* WARE then told DREW *“This is what I’m saying though, this is what I’m saying...I just want to be done. ...I’m saying I want to be done.”* DREW then stated *“Because...now somebody give you some attention and you wanna be done? That’s what I’m saying, bro. What, why is you playing? Don’t ever, don’t ever not answer no jail call. Why is you playing with jail calls, like, bruh? That’s why I’m saying, bruh. Bruh. The shit you do. They way you move. Bro, like come on, bruh. Like, come on, bruh. Come on, bruh. This shit bigger than me and you, bruh. This shit bigger than Nino Brown.”*

24. The two continued to argue. At approximately 3:45 into the call, DREW stated, *“You try to ruin people then you talkin’ ‘bout you done! Then you say, then you say funny shit, talkin’ ‘bout I’m trying to help you! How the hell! Come on, cuz, you know that’s not what’s going on.”* WARE then

replied, *"Ok...that's cool."* DREW then asked, *"...how the hell can you be mad at me!"* to which WARE responded, *"Look, ok, you keep talking! You keep fucking talking! You the only one talking, running your mouth."* DREW then exclaimed, *"Yo! You talking about talking! ...How? How? Everybody in the world know you talk too much!"* WARE then asked, *"Do they?"* to which DREW responded *"Yes! Yes!"* WARE clarified again *"How they know that?"* to which DREW replied, *"I ain't...Everybody know that though. That ain't no bullshit! If they don't they know now! ...Look at you! Tryin' to trick people off the street! Look at you! You one of them!"*

25. DREW continued making similar comments to WARE and stated *"I gotta watch what I say around people like you."* DREW stated *"I'm a smarter man...I love you, I ain't got no problem with you...feel me? I ain't the one who said something...I just know motherfuckers answer questions that don't be asked...everything is my fault...I take the blame for everything...I shouldn't have let nobody 100% close to me...what the hell you doin? Who over there?"* At that point, WARE replied *"A fucking poodle."* WARE made another comment to DREW about the fact he was still talking, and again he referenced her *"talking"* and stated, *"Bro! Why are you talking about talking, bro! You literally answered questions that didn't even get asked."* DREW then told WARE *"Pick a side!"* and continued *"motherfuckers think...motherfuckers act, and I'm not doing no 10 years no none of that, nigga, the most I'll do is three, four...if you try to hold that, if try to hold that over my head, girl you can never fuck with me on no number, you can't fuck with me on no number!"* WARE repeatedly told DREW, *"That's not my problem!"*

26. At approximately 11:10 into the call, after WARE repeatedly told DREW not to call her back. DREW stated *"You tried to ruin me and you acting like that towards me! Bro...niggas...you know what you are. I ain't mad. I ain't mad. I'mma just smarten up. I love you though."* As the two continued to argue, DREW stated *"Bro, you trying to play victim like you didn't just try to fucking ruin me! You literally tried to ruin me off a fucking lie that motherfucker told you! Motherfuckers told you a bold*

face and you just tried to ruin a nigga!” WARE admonished DREW, *“Bro! Here you go! Sticking your foot in your mouth every time you fucking open it.”* DREW kept telling WARE to *“calm down”* and to *“chill”*, and then again made references to her *“talking”*. DREW stated *“Bro, how can you, you should be the last person talking about talking when they’re not supposed to be talking. Like chill, come on. Calm down bitch! ...I love you...you don’t love me?”* WARE told DREW *“No.”* DREW claimed WARE was acting this way because *“a nigga showed you some attention so you good on me?”* to which WARE replied, *“Nobody showed me no...my nigga I’m not you!”* DREW then stated, *“You can never be me! You can never, you can never, you can never be me! You’re not, not solid.”*

27. Your Affiant would represent to the court that the pattern of behavior and statements made by DREW over the course of these conversations are evidence of DREW’s attempt to obstruct any future testimony by WARE on behalf of the government, DREW repeatedly referenced WARE *“talking”* and even admonished her that now everyone knows she did. DREW blatantly attempted to influence her position as a witness when he told her to *“Pick a side!”*, a statement your Affiant believes DREW intended to influence WARE to not cooperate further or against him. Your Affiant believes the statement DREW made regarding *“this”* being *“bigger than Nino Brown”* is an attempt to intimidate WARE by comparing this criminal organization to a character in the movie *New Jack City*, head of a fictional dominant drug-ring in New York City.

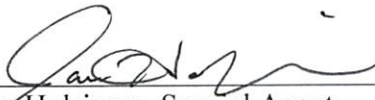
28. Lastly, your Affiant would note the two statements made by DREW in Paragraph 18. DREW, unbelieving of WARE’s whereabouts, required her to provide proof of who she was with. When UF#2, with WARE at the time, admonished DREW that he had *“more to worry about”* DREW turned to threatening violence. DREW’s statements *“she goin’ goddamn make me unload the clip on her”* coupled with the intent he himself verbalizes to carry out the act of violence, *“You will see when I do it”*. WARE told FBI Agents that the bullet hole in her apartment stemmed from DREW’s own firearm, during an altercation between the two of them. DREW again brings a firearm into the

situation by telling WARE and UF#2 that he will “*unload the clip*”, or what translates to firing every single round contained with the magazine of whatever firearm he would be holding at the time. Your Affiant would represent to the court that this threat against either WARE, or UF#2, who should now also be considered a witness for the government, is a threat of death.

29. Since the detention hearing on October 10, 2024, the defendant has contacted WARE, either by text or telephone on more than 150 occasions.

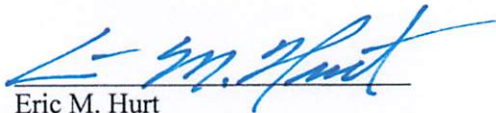
30. It is based on the above, I believe there is probable cause to believe violations of Title 18 U.S.C. § 1512 have been committed by ANTHONY DREW.

FURTHER YOUR AFFIANT SAYETH NOT.



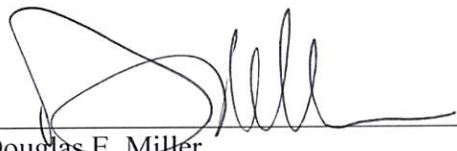
Jason Holsinger, Special Agent
Federal Bureau of Investigation

Reviewed by:



Eric M. Hurt
Assistant United States Attorney

Sworn and subscribed to before me
On this 16th day of October 2024



Douglas E. Miller
United States Magistrate Judge
Newport News, Virginia